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November 16, 2015

ORIGINAL

Chairwoman Susan Bitter Smith
Commissioners Bob Stump, Bob Burns, Tom Forese, and Doug Little
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Arizona Corporation Commission
DOCKETED

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Re: Keep APS on track with energy efficiency, Docket # E-01345A-15-0095

Dear Chairwoman Bitter Smith and Commissioners:

I am submitting written public comments on the proposed Arizona Public Service Company (E-01345A-15-0095) – Application for Approval of, with minor modifications, continuance of the Company's 2013 Demand Side Management Implementation Plan through 2015, on behalf of the Sierra Club's Grand Canyon (Arizona) Chapter and our more than 35,000 members and supporters, many of whom are APS customers.

The Sierra Club's mission is "to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments." The Sierra Club and our members have a significant interest in this plan as promoting energy efficiency is a top priority for our chapter and for our organization overall as it is the cleanest and cheapest energy resource.

Energy efficiency allows Arizonans and, in this case, Arizona Public Service (APS) customers, to reduce our electricity bills through installation of efficient lighting, more efficient air conditioners, and by repairing leaky ductwork, among many other things. It helps residential as well as business customers. Overall, Sierra Club sees energy efficiency programs such as those contained in this DSM Plan as a means to reduce pollution, reduce water use, and save money. These types of programs will also be critical for our compliance with the Clean Power Plan and further reducing our carbon emissions in Arizona.

In its 2015 Demand Side Management (DSM) Implementation Plan, Arizona Public Service (APS) is proposing to continue a great deal of its DSM portfolio of programs and to maintain its budget of \$68.9 million. While we would like to see an even greater investment in energy efficiency, the proposed budget will help to maintain a strong suite of programs for 2015. We support maintaining all of the cost-effective energy efficiency programs and expansion of the APS Light Emitting Diode (LED) lighting measure into more programs, as well as the increased Non-Residential Retro-Commission incentive cap from \$20,000 to \$100,000 with the 75% of project cost cap. We are sorry and disappointed to see APS suspend the Shade Tree Program, however, and hope to that the utility will come back with a cost-effective program in the



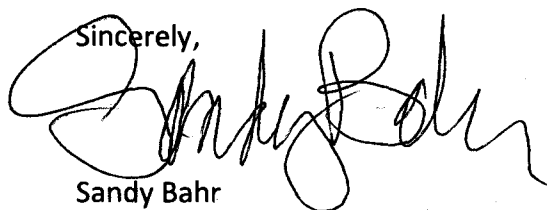
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future as other utilities have done. Shade trees do help to reduce our energy use and provides all kinds of benefits to our communities. We do have concerns about the Prepaid Program and agree that this should not go forward as a full-fledged program, if at all. This type of program can prey on those most vulnerable, including those with very low incomes. It can result in people losing their electricity when they need it the most. Any further development of this program must be carefully evaluated for those impacts.

In summary, we ask that you approve a strong DSM Plan and Budget for APS, that you maintain the commitment to many of the programs proposed, that you carefully evaluate the Prepaid Plan proposal, and that you encourage APS to come back with a cost-effective shade tree program for 2016, as well as to consider more of the emerging technologies to reduce energy consumption.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Sandy Bahr", written over the word "Sincerely,".

Sandy Bahr
Chapter Director
Sierra Club – Grand Canyon Chapter

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